

# **EXHIBIT A**

**Tomezsko, Sara B.**

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**From:** Tomezsko, Sara B.  
**Sent:** Thursday, January 14, 2021 7:15 PM  
**To:** 'Jumper, Maya'; Greene, Cara; Gelfand, Shira Z.  
**Cc:** Gage, Kenneth W.; Cedar, Christine  
**Subject:** RE: Google/Rowe - Request for Extension on Transcripts

Thank you for identifying these documents to us, Maya. Google's position with respect to the documents you intend to file is as follows:

1. GOOG-ROWE-00058501 – Google has no objection to you filing this document on the docket, particularly given that it has already filed portions of the document publicly.
2. GOOG-ROWE-00058806 – Google has no objection to you filing GOOG-ROWE-00058806, but seeks clarification as to whether you intend to file the attachment to this email in addition to the email itself. If so, Google will not waive confidentiality of the attached document, Nick Harteau's gHire packet.
3. GOOG-ROWE-00058834 – Google will not waive confidentiality of this document, as it contains discussions about business strategy and sensitive medical information about the family member of a third-party to this lawsuit.
4. GOOG-ROWE-00061493 – Google will not waive confidentiality of this document. It is the subject of our pending motion to retain documents under seal.
5. GOOG-ROWE-00061497 – Google will not waive confidentiality of this document. It is the subject of our pending motion to retain documents under seal.
6. GOOG-ROWE-00062099 – Google will not waive confidentiality of this document.

As to the transcripts of Ben Wilson and Evren Eryurek, while we acknowledge we have not yet submitted confidentiality designations, many pages from those depositions have already been filed publicly. To the extent either party has already filed the pages you intend to submit on the docket, we anticipate you will not be submitting those pages under seal. And of course, if you identify to us the specific pages you intend to submit sufficiently in advance of your filing, we can tell you whether we will assert confidentiality over any of the information therein.

Sara

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**PAUL**

**Sara Tomezsko | Associate, Employment Law Department**

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**From:** Jumper, Maya <MJumper@outtengolden.com>  
**Sent:** Thursday, January 14, 2021 12:52 PM

**To:** Cedar, Christine <christinecedar@paulhastings.com>; Greene, Cara <ceg@outtengolden.com>; Gelfand, Shira Z. <sgelfand@outtengolden.com>  
**Cc:** Gage, Kenneth W. <kennethgage@paulhastings.com>; Tomezsko, Sara B. <saratomezsko@paulhastings.com>  
**Subject:** [EXT] RE: Google/Rowe - Request for Extension on Transcripts

Hi Christine,

Relatedly, we intend to attach the following bates-numbered documents to Plaintiff's Reply to Defendant's Response to our Pre-Motion Letter to Compel Comparator Discovery:

1. GOOG-ROWE-00058501
2. GOOG-ROWE-00058806
3. GOOG-ROWE-00058834
4. GOOG-ROWE-00061493
5. GOOG-ROWE-00061497
6. GOOG-ROWE-00062099

Please advise whether Google intends to maintain its confidentiality designations with respect to these documents.

Further, given that Google has not yet designated any portion of the deposition transcripts of Ben Wilson or Evren Eryurek, we will plan to submit any excerpts of those transcripts under separate cover to the Court.

Thanks,  
Maya

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**From:** Cedar, Christine <[christinecedar@paulhastings.com](mailto:christinecedar@paulhastings.com)>  
**Sent:** Wednesday, January 13, 2021 4:09 PM  
**To:** Jumper, Maya <[MJumper@outtengolden.com](mailto:MJumper@outtengolden.com)>; Greene, Cara <[CEG@outtengolden.com](mailto:CEG@outtengolden.com)>; Gelfand, Shira Z. <[sgelfand@outtengolden.com](mailto:sgelfand@outtengolden.com)>  
**Cc:** Gage, Kenneth W. <[kennethgage@paulhastings.com](mailto:kennethgage@paulhastings.com)>; Tomezsko, Sara B. <[saratomezsko@paulhastings.com](mailto:saratomezsko@paulhastings.com)>  
**Subject:** RE: Google/Rowe - Request for Extension on Transcripts

Thank you, Maya.

Best,  
Christine

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**PAUL**

**Christine Cedar | Associate, Employment Law Department**

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**From:** Jumper, Maya <[MJumper@outtengolden.com](mailto:MJumper@outtengolden.com)>  
**Sent:** Wednesday, January 13, 2021 4:08 PM  
**To:** Cedar, Christine <[christinecedar@paulhastings.com](mailto:christinecedar@paulhastings.com)>; Greene, Cara <[ceg@outtengolden.com](mailto:ceg@outtengolden.com)>; Gelfand, Shira Z. <[sgelfand@outtengolden.com](mailto:sgelfand@outtengolden.com)>